

1 BROOKE K. KIM (SBN 239298)
brooke.kim@dlapiper.com
2 DLA PIPER LLP (US)
4365 Executive Drive, Suite 1100
3 San Diego, CA 92121-2133
Tel: 858.677.1400 | Fax: 858.977.1401

4 GREGORY G. SPERLA (SBN 278062)
greg.sperla@dlapiper.com
5 DLA PIPER LLP (US)
555 Mission Street, Suite 2400
6 San Francisco, CA 94015-2933
7 Tel: (415) 836-2500 | Fax: (415) 836-2501

8 CONNOR M. SCOTT (SBN 321714)
connor.scott@us.dlapiper.com
9 DLA PIPER LLP (US)
2000 Avenue of the Stars
10 Suite 400, North Tower
Los Angeles, CA 90067-4735
11 Tel: (310) 595-3000 | Fax: (310) 595-3300

12 Attorneys for Defendants
L'ORÉAL USA, INC. AND
13 L'ORÉAL USA PRODUCTS, INC.

14 **UNITED STATES DISTRICT COURT**
15 **CENTRAL DISTRICT OF CALIFORNIA**

16
17 JEFFREY L. THOMAS, an individual;

18 Plaintiff,

19 v.

20 L'ORÉAL USA, INC., L'ORÉAL USA
PRODUCTS, INC., JOHN PAUL
21 MITCHELL SYSTEMS, WELLA
OPERATIONS US, LLC, COTY, INC.,
22 CLAIROL, KOHLBERG KRAVIS
ROBERT & CO. a/k/a KKR & CO.,
23 INC., BRISTOL-MYERS SQUIBB,
PROCTER & GAMBLE HAIR CARE,
24 LLC, and JOHN DOE
CORPORATIONS 1-100;

25 Defendants.
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CASE NO. 2:25-cv-03957

*[Removed from the Los Angeles County
Superior Court, Case No. 25STCV11927]*

**DECLARATION OF BROOKE KIM
IN SUPPORT OF NOTICE OF
DEFENDANTS L'ORÉAL USA, INC.
AND L'ORÉAL USA PRODUCTS,
INC. OF REMOVAL OF ACTION
PURSUANT TO 28 U.S.C. §§ 1332,
1441, AND 1446**

*[Filed concurrently with Notice of
Removal]*

Complaint Filed: 04/23/2025

1 I, Brooke Kim, declare as follows:

2 1. I am an attorney at the law firm DLA Piper LLP (US), counsel for
3 Defendants L'Oréal USA, Inc. and L'Oréal USA Products, Inc. in the above-
4 captioned lawsuit. I am duly licensed to practice law in the State of California.

5 2. I submit this declaration in support of Defendants' Notice of Removal.

6 3. I am over the age of 18 years old, I have personal knowledge of the facts
7 set forth in this Declaration, and, if called as a witness, could and would competently
8 testify thereto.

9 4. Defendants L'Oréal USA, Inc. and L'Oréal USA Products, Inc. have not
10 been served in this action.

11 5. Attached hereto as **Exhibit A** is a true and correct copy of the Complaint,
12 filed with the Los Angeles Superior Court on April 23, 2025.

13 6. Attached hereto as **Exhibit B** is a true and correct copy of the Civil Case
14 Cover Sheet, filed with the Los Angeles Superior Court on April 23, 2025.

15 7. Attached hereto as **Exhibit C** is a true and correct copy of the Alternate
16 Dispute Resolution Packet, filed with the Los Angeles Superior Court on April 23,
17 2025.

18 8. Attached hereto as **Exhibit D** is a true and correct copy of the Minute
19 Order re: Complex Determination, filed with the Los Angeles Superior Court on April
20 30, 2025.

21 9. Attached hereto as **Exhibit E** is a true and correct copy of the Certificate
22 of Mailing for Minute Order re: Complex Determination, filed with the Los Angeles
23 Superior Court on April 30, 2025.

24 10. Attached hereto as **Exhibit F** is a true and correct copy of the Minute
25 Order re: Newly Assigned Case, filed with the Los Angeles Superior Court on May
26 2, 2025.

1 11. Attached hereto as **Exhibit G** is a true and correct copy of the Certificate
2 of Mailing for Minute Order re: Newly Assigned Case, filed with the Los Angeles
3 Superior Court on May 2, 2025

4 12. L'Oréal USA, Inc. and L'Oréal USA Products, Inc. are each
5 incorporated in Delaware and maintain a principal place of business in New York,
6 New York.

7 13. All real Defendant entities named in this lawsuit have not been served or
8 have consented to removal.

9 I declare under penalty of perjury under the laws of the United States of
10 America and the State of California that the foregoing is true and correct.

11 Executed on May 2, 2025, in Poway, California.

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13 /s/Brooke K. Kim

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